

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION

Defendants.

Case No. 24-cv-04872-SHS-OTW

**DECLARATION OF STEPHEN STICH MATCH**

I, Stephen Stich Match, declare as follows:

1. I am an attorney at Loevy & Loevy, which represents Plaintiff The Center for Investigative Reporting in this case.
2. I submit this declaration to facilitate the Court's comparison between two Mother Jones articles cited in Exhibit 11 to the First Amended Complaint (ECF No. 88-14) and parts of the abridgements of those articles by ChatGPT and Copilot quoted in the same exhibit. Black font conveys text present in the original but not the abridgement. Red font conveys text present in both the abridgement and the original.
3. Attached as Exhibit 1 is a comparison between the "Full Text Excerpt" included in the abridgement referenced in ChatGPT Example 4 (ECF No. 88-14 at 6-7) and the relevant text of the original article: Oliver Bullough, The Dark Side of the \$100 Bill, *Mother Jones* (Jan.-Feb.

2024), <https://www.motherjones.com/politics/2024/01/100-bill-crime-corruption-treasury-tax-evasion/>.

4. Attached as Exhibit 2 is a comparison between the “Excerpt” included in the abridgement referenced in Copilot Example 4 (ECF No. 88-14 at 14) and the relevant text of the original article: Carrie Arnold, When Profit-Driven Clinics Kick “Noncompliant” Patients off Dialysis, Is Anybody Watching?, *Mother Jones* (May-June 2024), <https://www.motherjones.com/politics/2024/05/dialysis-davita-fresenius-involuntary-discharge/>. This comparison preserves the separation between paragraphs, which the Copilot abridgement omits. The comparison also omits bold and italics.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 5, 2024.

/s/ Stephen Stich Match

Stephen Stich Match